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Pro Se Litigant

**IN THE UNITED STATES DISTRICT COURT DISTRICT FOR
THE NORTHERN DISTRICT OF FLORIDA (Pensacola Division)**

RUSSELL G. GREER,

Plaintiff

v.

JOSHUA MOON, publisher of the website
Kiwi Farms, **and KIWI FARMS**, a website

Defendants

**PLAINTIFF'S RULE 26(a)(1)
DISCLOSURES**

Case No.: 3:24-cv-00122-MCR-ZCB

Judge
Magistrate Judge:

Plaintiff Russell Greer comes now and submits his Rule 26 disclosures.

1. List of Individuals/Witnesses

There are witnesses who have witnessed the intentional copyright infringement by kiwi farms and the emotional toll it has taken on plaintiff. Due to the nature of kiwi farms' stalking and doxxing reputation, plaintiff does not feel comfortable listing addresses and phone numbers of witnesses PUBLICLY. Plaintiff would provide witnesses upon a stipulation with defendants' counsel that the witnesses would be provided under seal and names not published onto the kiwi farms' website. The witness shouldn't be intimidated by the bad actors on kiwi farms.

2. List of Documents, ESI or Tangible Things

There are not any documents in Plaintiff's possession that would need to be provided to Defendants' counsel, aside from just the many harassing messages and examples of copyright infringement done by the nefarious individuals on Kiwi Farms.

3. Computation of Damages

The damages are computed at \$150,000 *per* willful infringement. Four copyrights have been willfully infringed and so that would be \$600,000 in willful damages.

Respectfully submitted,



By:

Russell Greer

Pro Se Litigant

/rgreer

05-02-24

Certificate of Service

Plaintiff affirms that service was made to Defendants via email on 5-15-24 and that said attorney for defendants is Matthew Hardin. Documents are also being fedexed.to Mr. Hardin's address at

1725 I Street NW. Suite 300
Washington, DC 20006